

**RESNICK & LOUIS, P.C.**  
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*Inam Shah and Sasat Logistics, LLC*

**UNITED STATES DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

JESUS ZUNIGA;

Plaintiff,

v.

INAM SHAH; SASAT LOGISTICS, LLC;  
DOES I through V and ROE  
CORPORATIONS VI through X, inclusive

Defendants.

CASE NO.: 2:25-cv-00531-CDS-NJK

**STATEMENT REGARDING REMOVAL**

Defendants, INAM SHAH and SASAT LOGISTICS, LLC, by and through their counsel of record, MELISSA J. ROOSE, ESQ. and ROBERT L. THOMPSON, ESQ. of RESNICK & LOUIS P.C., hereby submit the following Statement Regarding Removal.

1. Date Complaint Was Served: The Complaint was filed in the Eighth Judicial District Court for Clark County, Nevada on January 23, 2025. See Complaint attached as Exhibit A to Notice of Removal (DOC 1-1). The Complaint was served on INAM SHAH, on January 31, 2025, and Defendant SASAT LOGISTICS, LLC on March 6, 2025. See Affidavits of Service of Process attached as Exhibit E and Exhibit H to Notice of Removal (DOC 1-5 and DOC 1-8).

2. Date Summons Was Served: The Summonses were served, respectively, on Defendant INAM SHAH, on January 31, 2025, and Defendant SASAT LOGISTICS, LLC on March 6,

2025. See Affidavits of Service of Process attached as Exhibit E and Exhibit H to Notice of Removal (DOC 1-5 and DOC 1-8).

3. Diversity Jurisdiction: The jurisdictional requirements of 28 U.S.C. § 1332 are met because there is diversity of citizenship among the parties and the amount in controversy exceeds \$75,000.00, exclusive of interests and costs.

a. There is diversity among the parties: Plaintiff, JESUS ZUNIGA, is and was a resident of the State of California and is therefore citizen of California for purposes of diversity. See Complaint filed in the Eighth Judicial District Court for Clark County, Nevada at ¶1 attached as Exhibit A to Notice of Removal (DOC 1-1). Defendant, INAM SHAH is, and was at the time this action was filed, a resident of Douglas County, Nebraska. Defendant SASAT LOGISTICS, LLC is, and was at the time this action was filed, a limited liability company with its principal place of business in Douglas County, Nebraska. As such, there is diversity of citizenship between the parties.

4. Summary of the evidence demonstrating the amount in controversy: This matter stems from an alleged motor vehicle accident on March 2, 2023, in Mineral County, Nevada. On March 5, 2025, Plaintiff filed a Request for Exemption From Arbitration asserting past medical specials of \$224,346.24 wherein the damages in controversy are in excess of \$75,000.00.

5. Notice of Removal was filed within 30 days after receiving a copy of the Summons and Complaint: The Notice of Removal was filed within 30 days after SASAT LOGISTICS, LLC received a copy of the Summons and Complaint and is timely pursuant to 28 U.S.C. § 1446(b)(3).

6. Actions commenced more than one (1) year before date of removal: The state court action was not commenced more than one year before the date of removal. See Notice of Removal.

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1 7. Names of any defendants known to have been served before removal who did not  
2 formally join: None.

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4 DATED this 25<sup>th</sup> day of March 2025.

**RESNICK & LOUIS, P.C.**

*/s/ Melissa J. Roose*

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*Attorneys for Defendants,*  
*Inam Shah and Sasat Logistics, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that service of the foregoing **STATEMENT REGARDING REMOVAL** was served this 25<sup>th</sup> day of March 2025, by:

☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada, addressed as set forth below.

☐ **BY FACSIMILE:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document.

☒ **BY ELECTRONIC SERVICE:** by transmitting via the Court's electronic filing services the document(s) listed above to the Counsel set forth on the service list on this date pursuant to EDCR Rule 7.26(c)(4).

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/s/ Shyanne Jackson  
An Employee of Resnick & Louis, P.C.